

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Aaron Burden,

Plaintiff,

v.

The City of Chicago, and Chicago  
Police Officers Albert Torres  
(#13067), Mohammad Baker  
(#19740), Andrew Kats (#17577),  
Angelo Dicera (#14902), and J.  
Doe Officers 1-5,

Defendants.

No. 22-cv-46

Hon. Judge Edmond E. Chang

Hon. Mag. Judge Young B. Kim

JURY TRIAL DEMANDED

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**JOINT STATUS REPORT**

The parties, by and through their undersigned counsel, submit the following Joint Status Report in accordance with this Court's Order of September 9, 2022 [Dkt. 64]:

**1. Initial Status Report**

On April 22, 2022, the parties filed a Joint Status Report [Dkt. 28].

**2. Status of Discovery**

On April 27, 2022, Judge Lee set scheduling deadlines in this matter, and ordered discovery to proceed on all claims, expressly including *Monell*, with a fact discovery cutoff of May 19, 2023 [Dkt. 30, 31].

Plaintiff and Defendants exchanged initial written discovery requests on July 1, 2022. The parties have exchanged responses to written discovery. On September 15, 2022, Defendants produced over 2,000 pages of documents after they had been bates stamped by their third-party vendor. The City in its responses has declined to respond to *Monell* discovery, citing its pending

motion to dismiss and motion to stay and bifurcate Plaintiff's *Monell* claim. [Dkt. 44, 47]. Plaintiff objects to this position and believes it to not be in compliance with Judge Lee's April 27, 2022 order [Dkt. 30].

Plaintiff will review all responses and meet and confer with Defendants as appropriate to address questions regarding the sufficiency of production.

Defendants anticipate conferring with Plaintiff also in review of their discovery responses through Rule 37.2 conference communications.

Depositions have not yet been scheduled in this action.

Dated: September 16, 2022

Respectfully Submitted,

/s/ Daniel Massoglia

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**CERTIFICATE OF SERVICE**

I, Daniel Massoglia, an attorney, hereby certify that a copy of this document was filed before 11:59pm on September 16, 2022 using the Court's CM/ECF filing system, which generates electronic notice to all parties of record in the case.

/s/ Daniel Massoglia  
*One of Plaintiff's Attorneys*